

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

ETHICON ELECTION WAVE CASES  
LISTED IN EXHIBIT A TO PLAINTIFFS'  
NOTICE OF ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT  
JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE REGARDING HARVEY  
A. WINKLER, M.D., FOR ELECTION WAVE**

Plaintiffs have filed a Notice of Adoption [Dkt. 7327] in the Election Wave cases identified in Exhibit A to their Notice, adopting their Wave 4 Motion to Exclude Expert Testimony of Harvey A. Winkler, M.D., Dkt. 3671 (motion), 3675 (memorandum in support).

Defendants hereby adopt and incorporate by reference their Wave 4 *Daubert* response [Dkt. 3784] for Election Wave. For the reasons stated in Defendants' Wave 4 briefing [Dkt. 3784], Plaintiffs' motion should be denied.

Respectfully submitted,

s/ William M. Gage

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COUNSEL FOR DEFENDANTS  
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**CERTIFICATE OF SERVICE**

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

*s/ William M. Gage* \_\_\_\_\_  
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